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ORIGINAL

ILLINOIS COMMERCE COMMISSION

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

**ILLINOIS
COMMERCE COMMISSION**

JUL 10 1 11 PM '01

In the Matter of

Illinois Bell Telephone Company

**Application for Review of Alternative
regulation plan**

Illinois Bell Telephone Company

**Petition to rebalance Illinois Bell Telephone
Company's Carrier Access and Network
Access Line Rates**

**Citizens Utility Board and
The People of the State of Illinois**

-vs-

Illinois Bell Telephone Company

**Verified Complaint for a Reduction in Illinois
Bell Telephone Company's Rates and Other
Relief**

CHIEF CLERK'S OFFICE

98-0252

98-0335

(consol.)

00-0764

MOTION TO AMEND THE SCHEDULE

NOW COMES the Staff of the Illinois Commerce Commission ("Staff"), by and through its attorneys, and pursuant to Section 200.190 of the Illinois Administrative Code, 83 Ill. Adm. Code 200.190, hereby moves the Administrative Law Judges assigned to this docket to extend the schedule set for briefing the effects of HB 2900 being signed into law on the issues addressed in this Docket.

In support of this Motion to Extend, Staff states the following:

1. Pursuant to the recent direction of the Judges, Staff and the other parties are to file

their positions regarding the enactment of HB2900 in the following manner:

Initial Briefs are due on July 13, 2001;

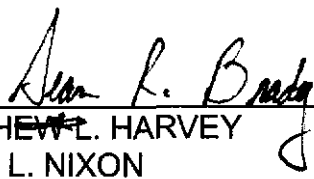
Reply Briefs are due July 23, 2001.

2. Staff's ability to provide adequate briefs on July 13 and July 23 is impaired due to its participation in numerous filings and hearings scheduled between now and July 23. It would be difficult, if not administratively impossible, to reschedule these other matters to accommodate the filing schedule suggested for this Docket
3. Moreover, the briefing schedule was set by the Administrative Law Judges only one and two weeks prior to filing initial and reply briefs, respectively. This time frame may not be adequate, given that some parties failed to take advantage of the previous opportunity to address these matters in their respective Briefs and Reply Briefs On Exception to the HEPO.
4. Staff is not aware of any statutory deadline or other compelling reason for requiring briefs on the effects of the new law be submitted on such an expedited schedule.
5. Therefore, Staff requests that the filing dates for the Initial Briefs on New Law Impacts be rescheduled to July 23, 2001, and that the Reply Briefs on New Law Impacts be changed to August 13, 2001, respectively.
6. Staff avers that the above request to extend the filing dates will provide Staff and all parties to this proceeding sufficient time to properly address the impacts of HB 2900 on this proceeding. Additionally, the above request will ensure that the Commission has a complete record upon which to make a determination of the relevant issues in this proceeding. The granting of this request does not work any significant delay on

the outcome of the proceedings and will not prejudice the rights of any party to this proceeding.

WHEREFORE, for all the reasons stated herein, Staff respectfully prays that its Motion To Amend the Schedule be granted by the Administrative Law Judges.

Respectfully submitted,



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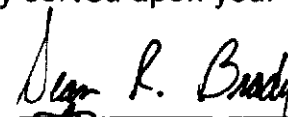
Counsel for the Staff of the
Illinois Commerce Commission

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Bell Telephone Company)	
)	98-0252
Application for Review of Alternative)	
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Access Line Rates.)	(cons.)
Citizens Utility Board and)	
The People of the State of Illinois)	
-vs-)	
Illinois Bell Telephone Company)	
)	00-0764
Verified Complaint for a Reduction in Illinois)	
Bell Telephone Company's Rates and Other)	
Relief.)	

NOTICE OF FILING

PLEASE TAKE NOTICE that we have on this 6th day of July, 2001, filed with the Chief Clerk of the Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois, the Motion of the Staff of the Illinois Commerce Commission to Amend the Schedule, a copy of which is hereby served upon you.

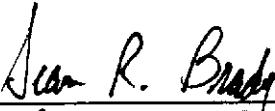


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the above Notice, together with copies of the document referred to therein, have been served upon the parties to whom the Notice is directed by mail, proper postage prepaid, from Chicago, Illinois on the 6th day of July, 2001.



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00-0764... ..MLH/SRB/DLN
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